

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:  
  
ALL CASES

**DECLARATION OF ROOPAL P. LUHANA  
IN SUPPORT OF ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE FILED UNDER SEAL**

I, Roopal P. Luhana, declare:

1. I am an attorney in the law firm of Chaffin Luhana, LLP, appointed Co-Lead counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am admitted *pro hac vice* in this coordinated action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein

2. Because the materials at issue were designated confidential by the parties in other matters, Plaintiffs filed the following under seal:

Document	Description	Designating Party
The Parties' Letter Brief re: the production of safety data and statistics	Portions of briefing referring to documents the Parties filed under seal	Uber
Exhibit [C] to the Parties' Letter Brief	A document produced by Uber in this litigation	Uber
Exhibit [D ] to the Parties' Letter Brief	The declaration of Katherine MacDonald filed under seal in Case No. CJ-21-005188.	Uber
Exhibit [G ] to the Parties' Letter Brief	The declaration of Randall Luskey filed under seal in Case No. CJ-21-005188.	Uber

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of June, 2024 in New York, NY.

/s/ Roopal P. Luhana  
Roopal P. Luhana